



INFORMATION NOTICE FOR BROWSERS ON THE LAFITE WEBSITE

Last update: 19 April 2024

SUMMARY



WHO USES MY DATA? [\[More information at 2\]](#)

Company: Les Domaines Barons de Rothschild (Lafite)
Registered office: 40 - 50 Cours du Médoc, 33 300 Bordeaux, France
TRADE AND COMPANIES REGISTER: 308 382 928 (Bordeaux)
Share capital: €12,148,320



WHY DO YOU USE MY DATA? [\[More information at 4\]](#)

- To analyse the website audience (legitimate interest)
- To respond to your requests for information (contract)
- To secure the website (legitimate interest)
- To ensure the technical functioning of the website (legitimate interest and consent)
- To respond to your requests about your data (legal obligation)



WHAT DATA DO YOU USE? [\[More information at 5\]](#)

- Identification data
- Professional data
- Connection data
- Data voluntarily provided by you



FOR HOW LONG? [\[More information on 7\]](#)

- Requests for information: 6 months from the last correspondence
- Audience analysis: 13 months maximum
- Securing the Website: 6 months maximum
- Requests and claims Response time + expiry (after archiving)



HOW IS MY DATA SECURED? [\[More information at 10\]](#)

- Physical security measures
- IT security measures (with ISSP)
- Notification of potential breaches



WHAT ARE MY RIGHTS CONCERNING MY DATA? [\[More information at 6\]](#)

- Right of access
- Right of rectification
- Right to withdraw your consent
- Right to object or to erasure
- Right to restrict processing
- Right to data portability
- Post-mortem instructions
- CNIL claim



HOW TO REACH US? [\[More information on 12\]](#)

Les Domaines Barons de Rothschild (Lafite)
Service juridique
40 - 50 Cours du Médoc
BORDEAUX 33300, FRANCE
rgpd@lafite.com

Table of contents

INFORMATION NOTICE FOR BROWSERS ON THE LAFITE WEBSITE	1
Last update: 18 January 2024.....	1
(1) PURPOSE OF THIS NOTICE.....	2
(2) WHO USES YOUR DATA?	3
(3) HOW IS YOUR DATA COLLECTED?	3
(4) FOR WHAT PURPOSES ARE YOUR DATA USED?	3
(5) WHAT DATA IS USED BY DBR?	4
(6) ON WHAT GROUNDS DO WE USE YOUR DATA?	4
(7) HOW LONG DO WE KEEP YOUR DATA?	5
(8) RECIPIENTS OF YOUR DATA?.....	5
(9) TRANSFER OF YOUR PERSONAL DATA OUTSIDE THE EU	6
<u>(10)</u> DETAILS OF THE SECURITY MEASURES IMPLEMENTED BY DBR.....	6
(11) - WHAT ARE YOUR RIGHTS CONCERNING YOUR DATA?	7
(12) HOW CAN YOU EXERCISE YOUR RIGHTS?	7
(13) ABOUT COOKIES.....	8
(14) SUMMARY	9

(1) PURPOSE OF THIS NOTICE

In summary: This document is intended to inform you about the conditions under which the publisher of the website <https://www.lafite.com> (hereinafter the “*Website*”) uses your data when you visit it.

Les Domaines Barons de Rothschild (Lafite)(hereinafter “*DBR*” or “*we*”) attaches particular importance to the transparency of its practices, in particular with regard to respecting your rights over your personal data, i.e. data enabling you to be identified, directly or indirectly (hereinafter “*Personal Data*” or “*Data*”).

This notice (hereinafter “*Notice*”) is designed to inform you about how we collect and use your Data when you browse and/or use certain features of our Website.

Updates. DBR updates this Policy to comply with any changes in the Regulations, and as necessary.

Questions. If you have any questions about this Policy and DBR’s Personal Data Protection practices, please contact us directly using the following contact details:

Les Domaines Barons de Rothschild (Lafite)
Service juridique
40 - 50 Cours du Médoc
BORDEAUX 33300, FRANCE
rgpd@lafite.com

(2) WHO USES YOUR DATA?

In summary: DBR is the Data Controller of the Personal Data collected via the Website.

Personal Data are collected and processed by Les Domaines Barons de Rothschild (Lafite), the full contact details of which are provided below. DBR is therefore the Data Controller of your Data within the meaning of the General Data Protection Regulation (or “*GDPR*”).

Organisation name	Les Domaines Barons de Rothschild (Lafite)
Legal form	Société en commandite par actions
Address	40 – 50 Cours du Médoc, 33 300 Bordeaux, France
TRADE AND COMPANIES REGISTER No.	BORDEAUX 308 382 928, FRANCE
Share capital	€12,148,320
Email contact	rgpd@lafite.com

(3) HOW IS YOUR DATA COLLECTED?

In summary: We collect certain Data about you when you visit our Website or use some of its features.

We collect your Data:

- When you **visit the Website** and enter your language and age,
- When you fill out a **contact form**,
- When you send us an **email** directly,
- When you make a **request to exercise rights** concerning your Data,
- When you **browse our Website**, via audience measurement cookies. We use an **audience measurement tool** that respects your Data, configured to be exempt from consent in accordance with CNIL guidelines,
- When you accept the deposit of **cookies** that are subject to your consent.

(4) FOR WHAT PURPOSES ARE YOUR DATA USED?

In summary: We only use your Data for the purposes specifically described below.

The purpose of using your Data is to manage the Website published by DBR. In this context, the use of your Data allows us more specifically to:

- Check whether you are of legal drinking age,
- Offer you a version of the Website in a language that you can read,
- Compile **statistics** on audience and use of the Website,
- Manage your **requests for information** via our contact forms and email addresses,
- Ensure the **security** of our Website (logging),
- Manage the **technical administration** of the Website and its proper functioning (particularly for hosting),
- Allow you to play videos hosted on our Youtube and Vimeo accounts,
- Manage your requests to exercise **rights** on your Data.

Clarifications. Your Data will not be used for any purpose other than those specified above. Our processing does not involve automated decision-making.

(5) WHAT DATA IS USED BY DBR?

In summary: We use the Data strictly necessary for the purposes identified above.

Categories of Data. To achieve the objectives set out above, we will collect:

- Identification data** (full name, email address, proof of identity in case of legitimate doubt),
- Professional data** (individual, journalist, professional),
- Data that you provide to us **voluntarily** in the free field or by email,
- Connection data** and navigation data (timestamp, IP address, equipment data, connection ID, etc.) necessary for its security, technical management and audience analysis,

From whom? This Data will be collected from you or, as the case may be, from the personnel in charge of the technical administration of the Website and authorised service providers. Certain Data (connection, advertising targeting, preferences) may be collected and used by third parties (video hosts) when you accept the deposit of cookies not necessary for the operation of the Website.

Mandatory nature. The collection of certain Data is **mandatory** (unless otherwise stated in the collection form), as it is sometimes necessary for the purposes referred to above. For example, if you do not fill in the fields with an asterisk, we will not be able to respond to your contact request.

(6) ON WHAT GROUNDS DO WE USE YOUR DATA?

In summary: We collect your Data on the basis of the following identified legal bases: the performance of the contract concluded with you, our legitimate interest, our legal obligations.

To be lawful, the use of your Data must be based on one of the six legal bases provided for by the GDPR. The use of your Data is justified in this case:

- By carrying out pre-contractual or **contract** measures when you request information via our online form or by email,
- By our **legitimate interest** when we deploy measures necessary for the security, technical management and audience measurement of our Website (we use the MATOMO tool which is exempt from consent),
- By complying with a **legal obligation** when you make a request to exercise rights with us or when we ask you if you are of legal age to visit our Website.
- By your **consent** when you accept the deposit of third-party cookies for the reading of videos on our Website.

(7) HOW LONG DO WE KEEP YOUR DATA?

In summary: We use your Data for the time strictly necessary for the purposes for which it was collected.

OBJECTIVES PURSUED	HOLDING PERIODS
Information request management	Time required to respond to your request and a maximum of 6 months from your last correspondence.
Website audience analysis	Between 30mn and 13 months maximum
Combating fraud and securing the Website	6 months maximum
Management of your requests and complaints concerning your Data	Time required to process your request, determined according to its nature. Provisional archiving for the applicable limitation period.
Technical management of the Website	See section 13 "cookies"
Video playback on the Website	See section 13 "cookies"
Verification of legal age	See section 13 "cookies"
Management of preferences relating to the choice of language of the Website	See section 13 "cookies"

(8) RECIPIENTS OF YOUR DATA?

In summary: The persons and organisations with access to the Personal Data processed by DBR are identified and undertake in particular to respect Data Subjects' rights via specific contractual commitments.

Our staff. To achieve the purposes described above, your Data may be used by our dedicated staff:

- Managing your requests for information (sales department),
- Securing our Website (DSi and/or RSSi),
- Managing any requests you may have regarding your Data (legal department),
- Technical administration and security of the Website.

Third Parties. Certain Data will also be transmitted to the following service providers and subcontractors:

- The host of our Website (CISValley),
- The email solution host/provider,
- The publisher of our audience measurement tool (MATOMO),
- The publishers of online video hosting solutions (Youtube, Vimeo), which may carry out their own processing of your Data in accordance with their own privacy policies.

Clarifications. We ensure that our subcontractors and service providers have limited access to your Data

- They provide the necessary guarantees,
- They make a contractual commitment to process your Data in compliance with the regulations applicable to your Data.

(9) TRANSFER OF YOUR PERSONAL DATA OUTSIDE THE EU

In summary: In principle, DBR does not transfer the Personal Data it processes outside the European Union. If DBR is required to perform such a transfer, it does so in accordance with the applicable Regulations.

Information. Some of the above providers and processors store Data about you anywhere in the world, including countries outside the European Union.

Measures. However, we take all necessary measures to avoid or minimise such transfers and, when we do so, to comply with the Regulations, so that the level of protection of Data Subjects guaranteed by the same Regulations is not compromised.

Commitments. These third parties undertake to take the necessary measures to respect your rights concerning your Data, in particular through standard contractual clauses and additional security measures such as encryption for example.

(10) DETAILS OF THE SECURITY MEASURES IMPLEMENTED BY DBR

In summary: We are committed to ensuring the security of your Data.

Commitments. We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk and nature of your Data.

Measures. We ensure the physical security of our premises and implement a set of IT security measures to guarantee the confidentiality of the Data (encryption, strong authentication, the use of a VPN for remote connections, logging and access restriction) and to restore the availability of the Data in the event of an incident in accordance with our information systems security policy (or "*ISSP*").

Personal Data Breaches. We have incorporated a procedure for notifying the CNIL of Personal Data breaches within seventy-two (72) hours. When the Personal Data breach is likely to result in a high risk to your rights and freedoms, this same procedure provides for you to receive detailed information.

(11) - WHAT ARE YOUR RIGHTS CONCERNING YOUR DATA?

In summary. You have a number of rights concerning your Data, as summarised below.

Your rights.	CLARIFICATIONS
Right of access.	You have a right to access your Data at any time, and to ask why we hold it.
Right of rectification.	You have the right to request correction of inaccurate Data concerning you.
Right to withdraw your consent	You may withdraw your consent to the processing of your Data when the processing is carried out after obtaining your prior consent.
Right of objection or deletion.	You may object to the use of your Data at any time or request its deletion, provided that its retention is no longer necessary.
Right of restrict processing.	You may object at any time to the use of your Data for reasons relating to your particular situation, except where such use is necessary for the performance of the contract or for compliance with a legal obligation to which we are subject
Right to data portability	You may exercise your right to obtain your Data in a structured, computer-readable form if you only provided it to us on a contract basis and if it is subject to automated processing.
Post-mortem instructions.	You have the right to give instructions regarding the holding, deletion and disclosure of your Data after your death.
Complaints.	You have the right to lodge a complaint with an authority if you consider that we have not complied with your rights. For example, if you live in France, you can send your complaint to the <i>Commission Nationale Informatique et Libertés</i> (link: https://www.cnil.fr/fr/adresser-une-plainte).

More information. Data Subjects can find more information about their rights by visiting the *Commission Nationale Informatique et Libertés* (French Data Protection Authority - CNIL) website (<https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles>) or with any other regulatory authority in their country of residence.

(12) HOW CAN YOU EXERCISE YOUR RIGHTS?

To exercise the rights concerning your Data or to send us any questions about the use of your Data, we invite you to contact us using the following contact details:

Les Domaines Barons de Rothschild (Lafite)
 Service juridique
 40 - 50 Cours du Médoc
 BORDEAUX 33300, FRANCE
rgpd@lafite.com

If we have a legitimate doubt about your identity, we will request proof of identity. In this case, remember to include an unalterable watermark on the supporting document before sending it to us.

(13) ABOUT COOKIES

What is a cookie? A “cookie” or tracker refers to a file that may be saved on your device’s hard drive (computer, tablet, smartphone) when viewing content or an online advertisement. This cookie file allows its issuer to identify the device in which it is stored, during the period of validity or storage of the cookie.

Interest of cookies. When you visit the Website, information about your browsing on the Website is saved in the "cookie" files installed on your device, making it possible to remember information such as the information you enter in an online form, or your language or age.

Use of cookies. In accordance with the regulations, the deposit of cookies generally requires your prior consent, with the exception of cookies strictly necessary for the provision of an online communication service at your request (functional cookies) or exempted (MATOMO cookies for example). In any event, the lifetime of a cookie may not exceed 13 months.

For more information. For more information on this subject, please follow the following information link: <https://www.cnil.fr/fr/site-web-cookies-et-autres-tracers>.

Cookies used on the Website. DBR only uses cookies that are strictly necessary for the operation of the Website. For audience measurement cookies, you can object to their use by clicking on the administration tab of the Website.

COOKIES NECESSARY FOR THE OPERATION OF THE WEBSITE		
These Cookies are necessary for the operation of the Website.		
They are therefore systematically installed on your device; you cannot object to them.		
COOKIE NAME	PURPOSE(S)	DURATION
Cookie accepted	This cookie is used to save your choices regarding whether or not cookies are stored	13 months maximum
pll_language	This cookie is used to record your choice regarding the language of the Website and your legal age	13 months maximum
AUDIENCE MEASUREMENT COOKIES		
These Cookies allow us to measure the audience of the Website while respecting your rights concerning your Data as far as possible (specific configuration in accordance with the recommendations of the CNIL).		

They are therefore systematically installed on your device without your prior consent, but you retain the right to object to them.

COOKIE NAME	PURPOSE(S)	DURATION
PIWIK (MATOMO) _pk_ref.nnnnn _pk_ses.nnnnn _pk_id.nnnnn	<p>The purpose of these cookies is strictly to measure the audience of the Website. More specifically, they are used to store your unique visit identifier, store your visit data and determine the origin of the visit.</p> <p>More information on the website of the publisher MATOMO. https://matomo.org/faq/general/faq_146/</p>	Between 30 mins and 6 months

THIRD PARTY COOKIES SUBJECT TO CONSENT

These Cookies are not necessary for the operation of the Website. However, they allow you to take advantage of certain features (reading videos hosted on third-party platforms, for example)

They are only installed on your device if you have previously consented to them.

COOKIE NAME	PURPOSE(S)	DURATION
YOUTUBE (GOOGLE) __sak LAST_RESULT_ENTRY_KEY LogsDatabaseV2:{id}	<p>We host videos on our YouTube channel, integrated into our Website. Watching the videos in question on the Website requires the deposit of cookies. These cookies make it possible to watch the videos that we integrate on the Website. They also allow YouTube to record your preferences and interactions with the content you view.</p> <p>More information on the website of the publisher YouTube (Google) https://policies.google.com/privacy</p>	Duration of your session or persistent, as applicable
VIMEO vuid	<p>We host videos on our Vimeo channel, which we integrate on our Website. Watching the videos in question on the Website requires the deposit of cookies. If you have a Vimeo account and are logged in, Vimeo may set cookies for analytics and advertising purposes and collect data related to your Vimeo account when you visit a page containing a Vimeo video.</p> <p>More information on the website of the publisher Vimeo https://vimeo.com/cookie_policy</p>	Duration of your session or ongoing, as applicable

(14) SUMMARY ...

MAIN OBJECTIVES	DATA COLLECTED	LEGAL BASES	HOLDING PERIODS
Response to requests for information (forms, emails)	Identification data <i>Full name, email address, message content, timestamp</i>	Execution of pre-contractual measures taken at your request (Art. 6, b) GDPR)	Time required to respond to your request and a maximum of 6 months from the last correspondence between us.

Verification of legal age	Identification data <i>Legal drinking age in country of origin (YES/NO)</i>	Compliance with a legal obligation <i>(Art. 6, b) GDPR)</i>	13 months maximum
Selection of the Website language	Identification data <i>Language read</i>	Our legitimate interest <i>(Art. 6, f) GDPR)</i>	13 months maximum
Website audience analysis	Navigation data <i>Pages visited on the Website, source of navigation</i>	Our legitimate interest <i>(Art. 6, f) GDPR)</i>	13 months maximum
Management of your requests and complaints concerning your Data	Identification data <i>Full name, email address (if requested by email), content of the message, proof of identity (in case of legitimate doubt)</i>	Compliance with a legal obligation <i>(Art. 6, b) GDPR)</i>	Time required to process your request, determined according to its nature. Provisional archiving for the applicable limitation period.
Combating fraud and securing the Website	Navigation data <i>IP address, connection logs</i>	Our legitimate interest <i>(Art. 6, f) GDPR)</i>	6 months maximum
Technical operation of the Website	Browsing data <i>IP address, connection logs</i>	Our legitimate interest <i>(Art. 6, f) GDPR)</i>	6 months maximum
Video playback on the Website	Browsing data and preferences.	Your consent <i>(Art. 6, a) GDPR)</i>	Duration of your session or ongoing, as applicable